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**COMMISSIONERS**  
TOM FORESE - Chairman  
BOB BURNS  
ANDY TOBIN  
BOYD W. DUNN  
JUSTIN OLSON



**COMMISSIONER**

Direct Line: (602) 542-3625  
Email: Tobin-Web@azcc.gov

**ARIZONA CORPORATION COMMISSION**

August 21, 2018

Docket Control  
Arizona Corporation Commission  
1200 W Washington St.  
Phoenix, AZ 85007

Arizona Corporation Commission

**DOCKETED**

**AUG 21 2018**

**RE: WS-02987A-18-0050**

My Fellow Commissioners:

**DOCKETED BY**

RECEIVED  
AZ CORP COMMISSION  
DOCKET CONTROL  
2018 AUG 21 A 9:17

I want to emphasize my appreciation for the Town of Queen Creek and Utilities Division Staff in their recent requests for administrative subpoenas in the above-captioned matter. In light of the recent events in this and related Dockets, I feel deeply that Johnson Utilities' track record for delay and blatant contumacy for the Commission's authority should no longer be allowed to prevent the Commission from taking action on its executive and judicial duties.

The history of Johnson Utilities has consistently been that of delay and obstructionism, unscrupulous litigation, and wanton disrespect, and now we are looking at potentially life-threatening conditions to the public, employees, and first responders while our interim manager agreement is suspended for an indefinite period of time.

The critical health and safety crises ECOR advised us of last week go to the heart of why urgency and compliance were so imperative for the Commission from the outset. As a natural monopoly subject to the regulatory compact of the Arizona constitution, Johnson Utilities is and always will be subject to complete and total access by the Commission. There is no other body in the state that has this responsibility, and it is incumbent on us to exercise our duties to the public as clearly and quickly as possible during these most dire of times and circumstances.

Feeling adamantly about this position, not only do I support the requests of the Town of Queen Creek and the Utilities Division Staff in seeking their respective subpoenas, but also I implore the Commission to exercise its authority to the greatest extent conceivable—by immediately calling an emergency open meeting upon receipt of this letter and issuing the sample search and seizure warrant I have prepared and attached for your decisive action.

I do not make this request lightly, and in the event of an affirmative vote, I strongly recommend the Commission permit the Legal Division to make all revisions necessary to the sample warrant for its effective implementation. However, the delay and obstructionism have gone on for too long—and I feel it is time we obtain a final resolution in this matter once and for all.

Respectfully,

Andy Tobin  
Commissioner

1 **COMMISSIONERS**

2 TOM FORESE - Chairman

3 BOB BURNS

4 ANDY TOBIN

5 BOYD DUNN

6 JUSTIN OLSON



7  
8 **ARIZONA CORPORATION COMMISSION**

9 WARRANT UNDER ARIZ. CONST. ART. 15 §  
10 5 POWER TO INSPECT AND INVESTIGATE  
11 THE PROPERTY, BOOKS, PAPERS,  
12 BUSINESS, METHODS, AND AFFAIRS OF  
13 THE PUBLIC SERVICE CORPORATION  
14 DOING BUSINESS IN ARIZONA: JOHNSON  
15 UTILITIES L.L.C.

DOCKET NO. WS-02987A-18-0050  
DOCKET NO. WS-02987A-18-0151  
DOCKET NO. WS-02987A-17-0392

16 **SEARCH AND SEIZURE WARRANT**

17 **TO:** Any authorized law enforcement officer.

18 The Arizona Corporation Commission hereby request the search and seizure of the following  
19 persons or property located in Arizona:

20 Any and all property, books, papers, business, and affairs of Johnson Utilities or of  
21 George H. Johnson, Gary Drummond, or Brad Cole related to Johnson Utilities that are  
22 related to the company's financial dealings, including, without limitation, the following:  
23 copies of all contractual agreements Johnson Utilities executed on or after January 1,  
24 2016, and the amount of consideration in each agreement; copies of all contractual  
25 agreements executed before January 1, 2016, that were still in effect after January 1,  
26 2016, and the amount of consideration in each agreement; all checks, payments, and  
27 money transfers Johnson Utilities made to third parties in each of the last 48 months;  
28 and bank statements for each of the last 48 months, including all transactions listed and  
the full names of all account holders, of all checking, savings, debit, and credit accounts  
for which Johnson Utilities is a named or joint account holder.

Any and all books, papers, and affairs of Johnson Utilities or of George H. Johnson,  
Gary Drummond, or Brad Cole related to Johnson Utilities that are related to  
engineering, system improvements, or the condition of Johnson Utilities' system at any  
time, including, without limitation, the following: a "Carollo Report;" all  
communications from Johnson Utilities made on or after January 1, 2016, seeking  
quotes, estimates, designs, plans, scopes of work, RFI's, RFP's, or other forms of  
engagement from a third party, to improve, repair, or add to any portion of Johnson  
Utilities' system; copies of all reports, memos, studies, estimates, or quotes, and related  
correspondence, that a third party generated on or after January 1, 2016, following an

1 inspection or evaluation of any portion Johnson Utilities' system or in response to  
2 estimating the cost or scope of work to improve, repair, or add to any portion of Johnson  
Utilities' system.

3 Any and all communications between Johnson Utilities and Pinal County, individual  
4 Pinal County Supervisors, the Town of Queen Creek, individual officials or employees  
5 of the Town of Queen Creek, the Town of Florence, and individual officials or  
6 employees of the Town of Florence; any and all communications that relate to Johnson  
7 Utilities between or among George H. Johnson, Gary Drummond, and/or Brad Cole; and  
8 any and all communications that relate to Johnson Utilities between George H. Johnson,  
9 Gary Drummond, or Brad Cole and Pinal County, individual Pinal County Supervisors,  
10 the Town of Queen Creek, individual officials or employees of the Town of Queen  
11 Creek, the Town of Florence, and individual officials or employees of the Town of  
12 Florence.

13 Any and all other property, books, paper, business, methods, and affairs of or related to  
14 Johnson Utilities under the power of the Commission to inspect and investigate under  
15 Ariz. Const. Art. 15 § 4 that Johnson Utilities, Gary Drummond, or Brad Cole have yet  
16 failed to furnish to the Arizona Corporation Commission.

17 The Arizona Corporation Commission finds that the evidence, recorded testimony, findings of  
18 fact, and conclusions of law established by the Commission in Docket No.'s WS-02987A-18-0050,  
19 WS-02987A-18-0151, and WS-02987A-17-0392, the signed letter of Arizona Corporation  
20 Commissioner Andy Tobin dated May 3, 2018 (Exhibit 1), the notice of failure to confirm access  
21 from US General Counsel of EPCOR Water USA, Martin Stanek, docketed August 15, 2018  
22 (Exhibit 2), and the evidence, recorded testimony, findings of fact, and conclusions of law related to  
23 imminent threats to public health and safety, blatant contumacy for the authority, rules, regulations,  
24 requests, subpoenas, and orders of the Arizona Corporation Commission, and refusal to cooperate  
25 fully with the interim manager entered into by the Arizona Corporation Commission on July 14,  
26 2018, establish probable cause to search and seize the persons or property described above, and that  
27 such search will reveal any or all of the following:

28 Any and all of the property, books, papers, business, method, and affairs under Ariz.  
Const. Art. 15 § 5 Power to Inspect and Investigate of a public service corporation doing  
business within in the state.

Violations of the reasonable rules, regulations, and orders of the Commission by which  
public service corporations shall be governed under Ariz. Const. Art. 15 § 3 Power of the  
Commission as to Rules, Contracts, and Accounts in transacting business within the state  
and for the convenience, comfort, and safety, and preservation of the health, of the  
employees and patrons of such corporations.

1 Violations by one or more officer, agent, or employee of a public service corporation of  
2 the Arizona Constitution, of Chapter 2 of Title 40 of Arizona Revised Statutes, or of an  
3 order, rule, or requirement of the Arizona Corporation Commission, as set forth under  
4 Ariz. Rev. Stat. § 40-426.

5 Contempt of the Commission by a corporation or person for failing to observe or comply  
6 with an order, rule, or requirement of the Commission or of any individual commissioner,  
7 as set forth under Ariz. Rev. Stat. § 40-424.

8  
9 **YOU ARE HEREBY COMMANDED** to execute this warrant on or before August 24, 2018, at any  
10 time in the day or night because good cause has been established.

11 **YOU ARE FURTHER AUTHORIZED** to obtain the assistance of the Arizona Corporation  
12 Commission's Utility Division and Legal Division Staff in executing this warrant and identifying the  
13 persons or property described above and the premises where they may be located.

14 **YOU ARE FURTHER AUTHORIZED** to delay notice of this warrant to the persons who, or  
15 whose, property will be searched or seized until, the facts justifying, the later specific date of August  
16 27, 2018, for the reasons I find as follows:

17 that immediate notification may have the substantial adverse result of destruction of or  
18 tampering with the property described above; and

19 that immediate notification may have the adverse result of serious potential intimidation of  
20 employees, officers, agents, or other persons of or related to Johnson Utilities or the Arizona  
21 Corporation Commission Staff.

22 On August 27, 2018, the officer executing this warrant, or an officer present during the  
23 execution of the warrant, shall give a copy of the warrant and a receipt of the property taken to the  
24 person from whom, or from whose premises, the property was taken, or leave the copy and receipt at  
25 the place the property was taken.

26 The officer executing this warrant, or an officer present during the execution of the warrant,  
27 shall prepare an inventory as required by law and promptly return this warrant to the Arizona  
28 Corporation Commission, Attn: Legal Division, 1200 W, Washington St., Phoenix, Arizona, 85007.

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**ISSUED:** \_\_\_\_\_, AUGUST \_\_\_\_, 2018 AT \_\_\_\_\_ A.M./P.M.  
PHOENIX, ARIZONA

**SIGNED:**

CHAIRMAN FORESE

COMMISSIONER DUNN

COMMISSIONER TOBIN

COMMISSIONER OLSON

COMMISSIONER BURNS

IN WITNESS WHEREOF, I, MATT NEUBERT, Interim  
Executive Director of the Arizona Corporation Commission,  
have hereunto, set my hand and cause the official seal of this  
Commission to be affixed at the Capitol, in the City of Phoenix,  
this \_\_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
MATT NEUBERT  
INTERIM EXECUTIVE DIRECTOR

DISSENT: \_\_\_\_\_

DISSENT: \_\_\_\_\_

## Exhibit 1



ORIGINAL 

ARIZONA CORPORATION COMMISSION  
Powering Arizona's Future

OPEN MEETING AGENDA ITEM



Arizona Corporation Commission

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AZ CORP COMMISSION  
DOCKET CONTROL

2018 MAY -3 P 3:51  
May 3, 2018

BOD Burns  
Andy Tobin  
Boyd Dunn  
Justin Olson

MAY -3 2018

DOCKETED BY 

Re: In the Matter of the Commission's Investigation of the Billing and Water Quality Issues of Johnson Utilities, LLC (WS-02987A-18-0050)

Dear Commissioners and Parties,

The purpose of this letter is to submit to this docket a synopsis of recent attempts by my office to obtain records of Johnson Utilities, LLC ("JU"), which I believe are relevant to this investigation, but to date, I have been unsuccessful in obtaining.

On March 8, 2018, I issued a Subpoena to JU which sought, among other things, correspondence between JU and the Town of Queen Creek. See Exhibit "A" (the "Johnson Subpoena"). The Johnson Subpoena was issued pursuant to Commission authority as set forth in the Arizona Constitution Article 15 § 4; A.R.S. §§ 40-241 and 40-244; and A.A.C. R14-3-109. The Johnson Subpoena was also issued in furtherance of the above-referenced investigation into JU.

On March 16, 2018, my office issued a public records request to the Town of Queen Creek. See Exhibit "B." Similar to the Johnson Subpoena, this public records request sought correspondence between JU and the Town of Queen Creek. The public records request was issued in furtherance of the above-referenced investigation into JU.

On April 3, 2018, JU's attorneys delivered a letter to the Commission's Chief Counsel objecting to the Johnson Subpoena. See Exhibit "C." More specifically, JU argued that the Johnson Subpoena was irrelevant to the investigation into JU and that the Johnson Subpoena sought documents that were within the scope of a Mutual Nondisclosure Agreement between JU and the Town of Queen Creek. Based on these objections, JU did not produce the records requested in the Johnson Subpoena.

On April 5, 2018 (Thursday), the Town of Queen Creek began delivering documents to the Commission in response to my public records request. The next day (Friday), JU sued the Town of Queen Creek, filed an Application for a Temporary Restraining Order ("TRO") to prevent the Town of Queen Creek from releasing additional documents, and obtained a Court order setting an initial hearing on the matter for April 9, 2018 (the following Monday). See Exhibit "D." On April 9, 2018, Judge Warner of the Superior Court of Arizona issued an order that the Town of Queen Creek shall not produce the requested records until after the TRO hearing, which was scheduled for April 12, 2018. See Exhibit "E."

The TRO hearing was then held on April 12, 2018. See Exhibit "F." JU, the Town of Queen Creek, and the Commission all appeared through counsel. I also personally attended that

hearing. The TRO hearing was consolidated with the preliminary injunction hearing and trial on the merits. *Id.* At the hearing, JU argued that the Town of Queen Creek should be prohibited from disclosing the records to the Commission. The Town of Queen Creek and the Commission both presented arguments in favor of producing the documents.

Following presentation of argument and evidence, Judge Warner denied JU's application for TRO, preliminary injunction, and permanent injunction. *Id.* Judge Warner also ruled that the documents I requested from the Town of Queen Creek were public records. *Id.* In furtherance of JU's desires, however, Judge Warner issued a temporary restraining order on releasing the disputed records, to provide JU time to seek relief from the court of appeals. *Id.* This temporary restraining order was set to expire at 5 p.m. on April 19, 2018. *Id.* Accordingly, despite losing its case in Superior Court, JU was still successful in continuing to block my review of records relevant to the above investigation.

JU filed a Notice of Appeal on April 16, 2018. On April 17, 2018, JU filed an Emergency Motion to Stay Pending Appellate Ruling, wherein JU requested that the Court of Appeals stay Judge Warner's expiration of the temporary restraining order. Ex. "G." Incredibly, the Court of Appeals issued an order the following day staying the expiration of the temporary restraining order pending its ruling on JU's Emergency Motion. Ex. "H." It is my understanding that the Commission was not served with JU's Emergency Motion on April 17, 2018, and was not even aware that it had been filed until the Commission received the April 18 Order from the Court of Appeals. Instead, the Commission received JU's Emergency Motion days later via regular mail. In other words, the Commission had no notice or opportunity to be heard before the Court of Appeals issued its April 18 Order further blocking my review of the public records relevant to the JU investigation.

JU's Emergency Motion was fully briefed as of April 27, 2018. In its pleadings, JU continued to argue that the records in possession of the Town of Queen Creek should not be disclosed to the Commission.

I was extremely disappointed to learn that on May 2, 2018, the Court of Appeals issued another order granting a further stay of the expiration of Judge Warner's temporary restraining order. Ex. "I." This order from the Court of Appeals provides that it will remain in place "pending further order of this court." *Id.* In other words, there is no end in sight as to when I will finally obtain access to these public records which the Town of Queen Creek does not object to producing.

In the meantime, the Commission has been conducting evidentiary hearings related to the allegations of billing, water, and wastewater quality issues at JU. The intent of these evidentiary hearings is to ensure that the parties are given a full and fair opportunity to be heard, and that the Commission has all the evidence before it prior to making any decisions. All parties to the proceeding are entitled to their due process, including JU, Staff, the Intervenors, and customers of JU. While the Commission has honored the spirit of due process in these proceedings, however, JU continues to block the Commission's access to documents which, in



my opinion, are critical to ensuring the Commission has all the information and evidence necessary to make an informed decision. It is perplexing to me that JU thinks financial information about its regulated water and wastewater operations should be kept hidden from the Commission.

I am deeply concerned that, if the allegations are true regarding JU's operations, further withholding of relevant evidence and the resulting delay of the JU proceedings will potentially present life safety issues to the citizens of Pinal County currently being served by JU. At a minimum, JU's conduct in response to the Johnson Subpoena, and its conduct in Superior Court and the Court of Appeals, have raised serious questions about whether this regulated entity is acting in good faith and with full disclosure in its dealings with the Arizona Corporation Commission.

Respectfully,

A handwritten signature in black ink, appearing to read "Andy Tobin", written in a cursive style.

Commissioner Andy Tobin

## Exhibit 2

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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

TOM FORESE – Chairman  
BOB BURNS  
ANDY TOBIN  
BOYD DUNN  
JUSTIN OLSON

IN THE MATTER OF THE COMMISSION'S  
INVESTIGATION OF THE BILLING AND  
WATER QUALITY ISSUES OF JOHNSON  
UTILITIES, LLC.

DOCKET NO. WS-02987A-18-0050

**NOTICE OF FILING JOHNSON UTILITIES  
FAILURE TO CONFIRM ACCESS**

The Utilities Division ("Staff") of the Arizona Corporation Commission ("Commission") hereby files correspondence between representatives of EPCOR Water Arizona, Inc., and Johnson Utilities, LLC ("Johnson"), that addresses Johnson's willingness to cooperate with EPCOR as the Interim Manager. At the August 14, 2018 Open Meeting, EPCOR indicated that had executed an Agreement for Interim Management Services, but that it would be necessary for EPCOR to have full access to all the accounting, billing, and bank accounts of Johnson to assume the role of Interim Manager. EPCOR indicated that it would make a request for that necessary access and report back to the Commission with any response that it received from Johnson. Attached is a copy of this correspondence wherein Johnson failed to respond to EPCOR by 4:00 pm on August 14, 2018 indicating that Johnson would allow EPCOR unfettered access to the Johnson's accounting, billing and bank accounts.

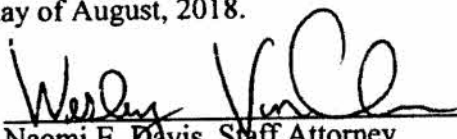
RESPECTFULLY SUBMITTED this 15th day of August, 2018.

Arizona Corporation Commission

**DOCKETED**

**AUG 15 2018**

DOCKETED BY

  
Naomi E. Davis, Staff Attorney  
Wesley C. Van Cleve, Senior Staff Attorney  
Robin R. Mitchell, Assistant Director  
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Arizona Corporation Commission  
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[rmitchell@azcc.gov](mailto:rmitchell@azcc.gov)

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AZCC COMMISSION  
DOCKET CONTROL

2018 AUG 15 A 9:36

## Robin Mitchell

---

**From:** Stanek, Martin <mstanek@epcor.com>  
**Sent:** Tuesday, August 14, 2018 4:29 PM  
**To:** Robin Mitchell  
**Cc:** Gysel, Joe; Bradford, Shawn; Gellman, Jason; Day, Troy  
**Subject:** Johnson Utilities

Earlier today, we provided legal counsel to Johnson Utilities the Johnson Acknowledgement and Consent that sets forth EPCOR's conditions precedent to assuming Interim Manager responsibilities for the Johnson Utilities systems. We made it clear to him that the conditions were a combination of items that we believed to be embodied in Commission Decision 76785 and items that we feel are necessary to assure that EPCOR would be able to develop and implement a plan to operate and maintain those systems without undue interference from Johnson. We also let him know that the conditions were not an invitation for negotiation, and that Johnson had until 4:00 pm today to return a signed copy of the Johnson Acknowledgement and Consent. Mr. Crockett contacted me this afternoon requesting a copy of the Agreement for Interim Management Services which I provided. As you know, the Scope of Work as Exhibit A to that agreement is still being finalized.

When we spoke with Johnson Utilities representatives this morning at the Commission, they were vigorously resisting allowing EPCOR access to all of the utility revenues. That was one of the Conditions Precedent, and EPCOR believes it to be a requirement under Commission Decision 76785. I have no reason to think that Johnson has changed its position on that issue. However, we did not receive any specific response from the Johnson team to the Johnson Acknowledgement and Consent. It is now past the 4:00 deadline for Johnson's delivery of a signed copy of the Johnson Acknowledgement and Consent, and EPCOR has not received any response from Johnson and has not received an executed copy of the Johnson Acknowledgement and Consent.

Pursuant to the terms of the Agreement for Interim Management Services, this email serves as notice to Commission Staff that EPCOR, as Interim Manager, believes that the Conditions Precedent (as that term is defined in the Agreement for Interim Management Services) are not being met and that the Agreement for Interim Management Services, therefore, is immediately and indefinitely suspended until those conditions are met.

Please contact me if you have any questions or need any further information.

Martin J. Stanek  
US General Counsel  
EPCOR Water USA  
2355 W Pinnacle Peak Road; Ste 300  
Phoenix, AZ 87027

Office – 623.445.2427  
Cell – 412.977.8138

[mstanek@epcor.com](mailto:mstanek@epcor.com)

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On this 21st day of August, 2018, the foregoing document was filed with Docket Control as a Correspondence From Commissioner, and copies of the foregoing were mailed on behalf of Andy Tobin, Commissioner - A.C.C. to the following who have not consented to email service. On this date or as soon as possible thereafter, the Commission's eDocket program will automatically email a link to the foregoing to the following who have consented to email service.

**Johnson Utilities L.L.C.**  
**WS-02987A-18-0050**

Albert H. Acken  
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**Consented to Service by Email**



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**Consented to Service by Email**

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**Consented to Service by Email**

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**Consented to Service by Email**

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Kelsey.pickard@pinalcountyaz.gov

**Consented to Service by Email**

By: 

Daniel Schwiebert  
Deputy Policy Advisor to  
Commissioner Andy Tobin